

ORIGINALIN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

FILED

OCT 17 2018

CLERK, U.S. DISTRICT COURT
By _____ Deputy

UNITED STATES OF AMERICA

v.

SAID AZZAM MOHAMAD RAHIM

No. 3:17-CR-169-B

**Supersedes Indictment Returned on
February 14, 2018.****SECOND SUPERSEDING INDICTMENT**

The Grand Jury Charges:

Foreign Terrorist Organization

1. On or about October 15, 2004, the United States Secretary of State designated al-Qaeda in Iraq (AQI), then known as Jam ‘at al Tawid wa’ al-Jahid, as a Foreign Terrorist Organization (FTO) under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224.
2. On or about May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (ISIL) as its primary name.
3. The Secretary of State also added the following aliases to the FTO listing: The Islamic State of Iraq and al-Sham (“ISIS” – which is how the FTO will be referenced

herein), The Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furquan Establishment for Media Production.

4. On September 21, 2015, the Secretary added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO.

5. From in or about August 2014 to August 30, 2016, Abu Mohammad al-Adnani (Al-Adnani) was ISIS's official spokesman and a senior leader under ISIS leader Abu Bakr al-Baghdadi. Al-Adnani was listed as a Specially Designated Global Terrorist by the United States government in August 2014. Al-Adnani was killed on or about August 30, 2016. Since as early as in or about 2014, Al-Adnani began publically calling for the murder of non-Muslims in western countries on behalf of ISIS. For instance, on or about September 21, 2014, ISIS released a speech by Al-Adnani entitled "Indeed your Lord Is Ever Watchful," which provided official instruction to ISIS supporters to kill non-Muslims in Western Countries. Among other things, Al-Adnani said, "if you can kill a disbelieving American or European . . . including the citizens of the countries that entered into a coalition against the Islamic State, then rely upon Allah, and kill him in any manner or way however it may be. Smash his head with a rock, or slaughter him with a knife, or run over him with your car, or throw him down from a high place, or choke him, or poison him," and "rise and defend your state from your place where you may be."

6. In addition, in an audio statement distributed on or about May 21, 2016, Al-Adnani called for Ramadan (which corresponded to June and July 2016) to be "a month of ruin for the nonbelievers" and urged "soldiers of the caliphate in Europe and America"

to carry out attacks and to target civilians, for “there are no so-called innocents.”

Al-Adnani’s speeches and calls for violence have been widely distributed on social media by ISIS supporters.

Count One

Conspiracy to Provide Material Support to a Designated Foreign Terrorist Organization
(Violation of 18 U.S.C. § 2339B)

7. Paragraphs 1-6 of this indictment are incorporated by reference as if set forth fully herein.
8. Beginning in or around October 2014 and continuing through March 2017, in the Northern District of Texas and elsewhere, the defendant, **Said Azzam Mohamad Rahim**, conspired with Coconspirator 1 and other persons known and unknown to the United States Grand Jury, to provide material support or resources, including services and personnel, to a foreign terrorist organization, namely ISIS, knowing that ISIS is a designated terrorist organization and that ISIS has engaged, and engages in, terrorist activity and terrorism.

In violation of 18 U.S.C. § 2339B.

Count Two

Attempting to Provide Material Support to a Designated Foreign Terrorist Organization
(Violation of 18 U.S.C. § 2339B)

9. Paragraphs 1-6 of this indictment are incorporated by reference as if set forth fully herein.

10. Beginning in or around October 2014 and continuing through March 2017, in the Northern District of Texas and elsewhere, the defendant, **Said Azzam Mohamad Rahim**, did knowingly attempt to provide material support or resources, including services and personnel, to a foreign terrorist organization, namely ISIS, knowing that ISIS is a designated terrorist organization and that ISIS has engaged, and engages in, terrorist activity and terrorism.

In violation of 18 U.S.C. § 2339B.

Count Three
False Statement to a Federal Agency
(Violation of 18 U.S.C. § 1001)

11. Paragraphs 1-6 of this indictment are incorporated by reference as if set forth fully herein.

12. On or about March 5, 2017, in the Northern District of Texas, the defendant, **Said Azzam Mohamad Rahim**, did knowingly and willfully make a materially false, fictitious and fraudulent statement and representation in a matter within the jurisdiction of the Federal Bureau of Investigation and involving international terrorism; that is during an interview conducted as part of a terrorism investigation, a federal law enforcement officer asked **Rahim**, “Okay. Have you ever discussed with anyone travel for the purpose of jihad?” **Rahim** responded “No.” That statement was false as **Rahim** then and there well knew that he had discussed with other individuals travel for the purpose of jihad.

In violation of 18 U.S.C. § 1001.

Count Four
False Statement to a Federal Agency
(Violation of 18 U.S.C. § 1001)

13. Paragraphs 1-6 of this indictment are incorporated by reference as if set forth fully herein.

14. On or about March 5, 2017, in the Northern District of Texas, the defendant, **Said Azzam Mohamad Rahim**, did knowingly and willfully make a materially false, fictitious and fraudulent statement and representation in a matter within the jurisdiction of the Federal Bureau of Investigation and involving international terrorism; that is during an interview conducted as part of a terrorism investigation a federal law enforcement officer asked **Rahim**, “Have you ever been a supporter of the Islamic State, ISIL, ISIS, Daesh?” Rahim responded “No.” That statement was false in that **Rahim** then and there well knew that he has been and was a supporter of ISIS (a/k/a the Islamic State, ISIL or Daesh.

In violation of 18 U.S.C. § 1001.

Count Five
False Statement to a Federal Agency
(Violation of 18 U.S.C. § 1001)

15. Paragraphs 1-6 of this indictment are incorporated by reference as if set forth fully herein.

16. On or about March 5, 2017, in the Northern District of Texas, the defendant, **Said Azzam Mohamad Rahim**, did knowingly and willfully make a materially false, fictitious and fraudulent statement and representation in a matter within the jurisdiction of the Federal Bureau of Investigation and involving international terrorism; that is during an interview conducted as part of a terrorism investigation, a federal law enforcement officer asked **Rahim**, “Have you ever promoted violence on behalf of the Islamic State, ISIS, ISIL?”. **Rahim** responded “No.” That statement was false as **Rahim** then and there well knew that he had promoted violence on behalf of ISIS, a/k/a the Islamic State, or ISIL.

In violation of 18 U.S.C. § 1001.

Count Six
False Statement to a Federal Agency
(Violation of 18 U.S.C. § 1001)

17. Paragraphs 1-6 of this indictment are incorporated by reference as if set forth fully herein.

18. On or about March 5, 2017, in the Northern District of Texas, the defendant, **Said Azzam Mohamad Rahim**, did knowingly and willfully make a materially false, fictitious and fraudulent statement and representation in a matter within the jurisdiction of the Federal Bureau of Investigation and involving international terrorism; that is during an interview conducted as part of a terrorism investigation, a federal law enforcement officer asked **Rahim**, “. . . Okay. Have you yourself ever encouraged anyone to follow [the] guidance of Abu Mohammed Al Adnani, including his instruction to kill infidels without consultation or permission?” **Rahim** responded “No, no.” That statement was false in that **Rahim** then and there well knew that he had encouraged people to follow the guidance of Abu Mohammand Al-Adnani, including Al-Adnani’s instructions to kill.

In violation of 18 U.S.C. § 1001.

Count Seven
False Statement to a Federal Agency
(Violation of 18 U.S.C. § 1001)

19. Paragraphs 1-6 of this indictment are incorporated by reference as if set forth fully herein.

20. On or about March 5, 2017, in the Northern District of Texas, the defendant, **Said Azzam Mohamad Rahim**, did knowingly and willfully make a materially false, fictitious and fraudulent statement and representation in a matter within the jurisdiction of the Federal Bureau of Investigation and involving international terrorism; that is during an interview conducted as part of a terrorism investigation, a federal law enforcement officer asked **Rahim** the following question: “[H]ave you ever promoted an act of terrorism?” **Rahim** responded “No. I have been coming here since 1995. I am clean.” That statement was false in that **Rahim** then and there knew that he had promoted an act of terrorism.

In violation of 18 U.S.C. § 1001.

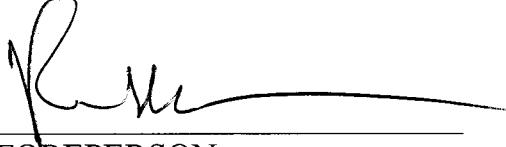
Count Eight
False Statement to a Federal Agency
(Violation of 18 U.S.C. § 1001)

21. Paragraphs 1-6 of this indictment are incorporated by reference as if set forth fully herein.

22. On or about March 5, 2017, in the Northern District of Texas, the defendant, **Said Azzam Mohamad Rahim**, did knowingly and willfully make a materially false, fictitious and fraudulent statement and representation in a matter within the jurisdiction of the Federal Bureau of Investigation and involving international terrorism; that is during an interview conducted as part of a terrorism investigation, a federal law enforcement officer asked **Rahim** the following question “Do you ever, okay, have you ever praised an act of terrorism?” **Rahim** responded “No.” That statement was false in that **Rahim** then and there knew that he had praised an act of terrorism, including the June 12, 2016 terrorist attack in Orlando, Florida, the July 14, 2016 terrorist attack in Nice, France, and the December 31, 2016 terrorist attack in Istanbul, Turkey.

In violation of 18 U.S.C. § 1001.

A TRUE BILL



FOREPERSON

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THE UNITED STATES OF AMERICA

V.

SAID AZZAM MOHAMAD RAHIM

SECOND SUPERSEDING INDICTMENT

18 U.S.C. § 2339B

**Conspiracy to Provide Material Support to a Designated Foreign Terrorist Organization
(Counts 1 and 2)**

18 U.S.C. § 1001
Possession with Intent to Distribute a Controlled Substance
(Counts 3-8)

8 Counts

A true bill rendered

FORT WORTH

Filed in open court this _____ day of October, 2018.

Defendant in Federal Custody since 3/6/2017

UNITED STATES MAGISTRATE JUDGE
Criminal Case Pending: 3:17-CR-169-B